Message

From: Nesci, Kimberly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=595346A8AF7F4753A47D24196F36ADE3-KIMBERLY A NESCI]
Sent: 1/27/2021 3:35:20 PM
To: Lara, Rhina [Lara.Rhina@epa.gov]; Ozmen, Shamus [Ozmen.Shamus@epa.gov]
CC: Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]
Subject: RE: OCSPP/RDD Jan. 28-2:00-3:00- agenda topics

Excellent, thank you so much! I'll forward to Ed and credit you all. K

From: Lara, Rhina <Lara.Rhina@epa.gov>
Sent: Wednesday, January 27, 2021 9:14 AM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Cc: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>
Subject: RE: OCSPP/RDD Jan. 28-2:00-3:00- agenda topics

Hi Kimberly,

Here are the talking points with links to the press statement, Qs&As and the briefing document (from R1) with a timeline is attached.

- OPP's Analytical Chemistry Lab (ACB) tested Clarke product (Anvil 10+10), and both fluorinated and un-fluorinated High Density Polyethylene (HDPE) containers for the presence of PFAS compounds.
- ACB is also in the process of developing a method for quantitative detection of PFAS in oily substances
- With regards to containers, ACB rinses containers with a solvent to determine the presence of PFAS. ACB has found the following:
    - Fluorinated containers provided by Clarke do contain PFAS
    - Unfluorinated containers provided by Clarke showed trace amounts of PFAS (near the limit of detection for the equipment used); ACB is investigating this, and it may be cross-contamination rather than the unfluorinated containers themselves, based on the small levels and the nature of the PFAS compounds.
- With regards to Anvil 10+10, ACB has found the following:
    - Clarke sample from the production line is cleaner (in terms of PFAS) than those that have been stored in containers (30-gallon drum and 2.5-gallon jug)
    - Sample of Clarke product directly from production line shows trace level of some PFAS and could be attributed to cross contamination
    - Samples of Clarke product stored in fluorinated containers (30-gallon drum and 2.5 gallon jug) show higher levels of PFAS (3-4x higher than production sample). However, the number of PFAS compounds found in the samples and their respective levels are ~100 fold less than the ones in the rinsates.
- Based on this, ACB hypothesizes that PFAS may be formed in the process of fluorinating High Density Polyethylene (HDPE) containers then leach into the Anvil 10+10 product. There is a plausible chemical pathway for this to occur. At this point, ACB does not have enough data to determine the leaching rate of PFAS from containers onto the products.
- OPP Is aware that many companies use fluorinated HDPE containers to store and distribute pesticide products. OPP is working closely with OPPT and OECA. OECA is seeking additional information from the company Clarke uses to fluorinate their containers: Inhance Technologies and we expect to receive that information shortly.
- It is unclear at this point:
    - whether this may be happening to other products, pesticide products and otherwise.
    - whether this is specifically as a result of the process that Inhance uses or can happen with any HDPE fluorination process.

- the conditions under which pfas is more or less likely to leach into pesticide products (solvents, temperature, time, etc...)

- We are discussing internally possible options for future testing to determine the above, as well as options to get state assistance with the testing.
- We are discussing internally the release of the data obtained to date.
- More information on this issue can be found online in our press statement and questions and answers document. We will update this page with more information as we conduct more testing.
  Press statement: https://www.epa.gov/newsreleases/epa-takes-action-investigate-pfas-contamination
  Qs&As: https://www.epa.gov/pesticides/pfas-packaging

Best,
Rhina M. Lara *(she/her/hers)*
Communications Branch
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Phone: (202) 815- 5722

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Wednesday, January 27, 2021 9:03 AM
To: Lara, Rhina <Lara.Rhina@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>
Cc: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>
Subject: FW: OCSPP/RDD Jan. 28-2:00-3:00- agenda topics

Hi – can you all help by adding these links to Ed's talking points? Thanks so much!!!

https://www.epa.gov/newsreleases/epa-takes-action-investigate-pfas-contamination

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From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Tuesday, January 26, 2021 5:24 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Wormell, Lance <Wormell.Lance@epa.gov>; ONeill, Sandra <ONeill.Sandra@epa.gov>; Wire, Cindy <Wire.Cindy@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: OCSPP/RDD Jan. 28-2:00-3:00- agenda topics

Thanks. Can you include the available web links and Q's and A's. Is there a timeline document too?

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Tuesday, January 26, 2021 4:00 PM
To: Messina, Edward <Messina.Edward@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Wormell, Lance <Wormell.Lance@epa.gov>; ONeill, Sandra <ONeill.Sandra@epa.gov>; Wire, Cindy <Wire.Cindy@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: OCSPP/RDD Jan. 28-2:00-3:00- agenda topics

Ed, here are the talking points I have on our lab testing, with new information in blue. Let me know if you have any questions.

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    - the conditions under which pfas is more or less likely to leach into pesticide products (solvents, temperature, time, etc...)
- We are discussing internally possible options for future testing to determine the above, as well as options to get state assistance with the testing.
- We are discussing internally the release of the data obtained to date.

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Monday, January 25, 2021 6:00 PM
To: Garcia, Beth <garcia.beth@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Wormell, Lance <Wormell.Lance@epa.gov>; ONeill, Sandra <ONeill.Sandra@epa.gov>; Wire, Cindy <Wire.Cindy@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
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OK. You can put me down for those two topics. Marietta, if there is a list you can provide to me before the call that would be great – Section 18s. Kimberly, I think I am good for the PFAS topic, feel free to send me the latest talking points on Thursday.

Ed

From: Garcia, Beth <garcia.beth@epa.gov>
Sent: Monday, January 25, 2021 5:57 PM
To: Messina, Edward <Messina.Edward@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Wormell, Lance <Wormell.Lance@epa.gov>; ONeill, Sandra <ONeill.Sandra@epa.gov>; Wire, Cindy <Wire.Cindy@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: OCSPP/RDD Jan. 28-2:00-3:00- agenda topics

Ed:

We appreciate all the calls with the regions with the these past two weeks.

For this Thursday's Jan. 28th OCSPP/RDD meeting, we have the following topics:

- OPP
  - 2021 Pesticide Environmental Stewardship Program Grants (PESP)
    - Speaker: Frank Ellis
  - National Pesticides Managers Meeting
    - Speaker: Sandra O'Neill

Potential topics

- Pending Section 18 applications
  - Speaker: Ed or Designee?
- PFAS Containers update
  - Speaker: Ed or Designee?

With respect to the potential topics, you mentioned on the Gringard call some pending Section 18 applications, is the timing right to include a Section 18 update on pending applications on this call? Similarly, are there any update on the PFAS containers to include for this call, e.g. status of lab results on website? Please let me know if those are two potential topics and the speakers. If not, I will hold off on those topics for now. Are there any other OPP topics you would like to add?

Sincerely,
Beth
Beth Garcia
Lead Region Coordinator for OCSPP
EPA Region 3
(215) 814-5243